

reference to a Plat drawn by R. Gauss and Associates dated June 3, 1985, a copy of which is attached hereto as Exhibit 3. Such parcel consists of 16.46012 acres more or less and is adjacent to that land owned by both Defendants.

5. That both Defendants are named herein solely because of the proximity of their land to the 16.46012 acre parcel of land claimed by Plaintiff herein.

6. Plaintiff's chain of title has been run by Michael S. Karas, Esquire, and an abstract of same is attached hereto and marked Exhibit 4.

7. As is shown by said abstract of title, one Nathan Peddicord received certain property from a tract of land called "Carolina", by virtue of a Deed dated January 20, 1848, and recorded in Liber WBT 7, Folio 681, which Deed contained a metes and bounds description, and describes the land therein as "containing what it may".

8. A second Deed into Nathan Peddicord's chain of title, dated May 14, 1849, and recorded in Liber WBT 9, Folio 420, also purports to grant land from a tract of land called "Carolina", provided a metes and bounds description and stated that the area contained therein was 16 acres and 30 perches, more or less.

9. That the deed at WBT 9, folio 420, a copy of which is attached hereto marked Exhibit 5, is believed to have conveyed the subject 16.46012 acres unto Plaintiff's chain of title.

10. That all other conveyances in Plaintiff's chain of title provide metes and bounds descriptions which are identical to that description in the first Deed referred to above; however, though none contain the metes and bounds descriptions of the subject acreage, all state that the area of the property to be conveyed is 56 acres more or less, which is the approximate area contained within the metes and bounds description of both of the foregoing Deeds.

11. That no out conveyance from Plaintiff's chain of title can be located.

12. As is shown by the survey plat attached hereto, there are long standing stone boundaries in the approximate areas of the metes and bounds description of the